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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHELLE DOWNEY,

Defendant.

No. 3:24-cr-00050-SLG-KFR

**UNOPPOSED MOTION TO
CONTINUE JUDGMENT AND
SENTENCING DATE**

**UNOPPOSED MOTION FOR CONTINUANCE OF JUDGMENT AND
SENTENCING DATE**

Motion

Michael Hansen, counsel of record for defendant Michelle Downey, moves this Court to continue the judgment and sentencing hearing from July 2, 2025, to September 23, 2025. The continuance is necessary to consult with the defendant regarding the presentence report, guideline calculations and other sentencing related matters. The motion is unopposed by government counsel and probation.

Dated June 6, 2025.

Respectfully submitted,

s/ Michael E. Hansen

MICHAEL E. HANSEN

Attorney for Michelle Downey

DECLARATION

1. I am the attorney of record for Michelle Downey.
2. The judgment and sentencing date is currently scheduled for July 2, 2025.
3. The continuance is necessary to consult with the defendant regarding the presentence report, guideline calculations and other sentencing related matters.
4. I have consulted with the government counsel and probation, and they are not opposed to the motion.

Dated June 6, 2025.

Respectfully submitted,

s/ Michael E. Hansen

MICHAEL E. HANSEN

Attorney for Michelle Downey